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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ)
MANAGEMENT, LLC, DONOR)
RELATIONS, LLC, TPFE, INC.,)
AMERICAN TECHNOLOGY SERVICES,)
COMPLIANCE CONSULTANTS,)
CHROME BUILDERS CONSTRUCTION,)
INC., and UNIFIED DATA SERVICES,)
Plaintiffs,)
v.)
BANK OF AMERICA, N.A. and JOHN)
and JANE DOES 1-100,)
Defendants.)

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
DEFENDANT'S OBJECTION TO
MAGISTRATE JUDGE'S ORDER [ECF
NO. 192]
(Second Request)**

Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, and IB 3-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the “Plaintiffs”), and the Defendant Bank of America (hereinafter “BOFA”), by and through their respective attorneys of record, hereby jointly stipulate to modestly extend the briefing schedule for the Plaintiffs to file a response to the Defendant’s Objection to the Magistrate Judge’s Order. (Docs. 192 and 200.) This is the second stipulation requesting an extension of time to

1 extend the deadline to respond to the Defendant's Objection. (Doc. 200.) Plaintiffs' response to
2 Defendant's Objection is was originally due November 18, 2021 and previously stipulated to extend
3 the deadline to December 1, 2021. (Doc. 211.) This request seeks an extension to December 6, 2021.
4

5 In support thereof, the Plaintiffs and BOFA represent as follows:

6 The Plaintiffs require additional time because Atty. Bernhoft, who is the lead drafter on this
7 paper, continues to deal with his family member's post-surgical medical situation, and this has taken
8 away from his availability to work. For this reason, the Plaintiffs require an extension of time to file
9 their response to BOFA's objections to this Court's Rule 30(b)(6) order.

10 Plaintiffs' counsel contacted BOFA's counsel and discussed extending the briefing deadline.
11 Based on those discussions, the Parties stipulate to an extended deadline for Plaintiffs to respond to
12 BOFA's Objection to the Magistrate Judge's Order to December 6, 2021. (Doc. 200.) The Parties
13 agree that the foregoing constitutes good cause to extend the briefing schedule deadlines.

14 **IT IS SO STIPULATED.**

15 Dated: November 23, 2021
THE BERNHOFT LAW FIRM, S.C.

16 Dated: November 23, 2021
17 SNELL & WILMER, L.L.P.

18 /s/ Daniel J. Treuden
Daniel J. Treuden, Esq.
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19 Attorney for Plaintiffs
20 Appearing *pro hac vice*

21 /s/ Holly E. Cheong
Amy F. Sorenson (NV Bar 12495)
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Las Vegas, Nevada 89169

22 *Attorneys for Bank of America, N.A.*

23 IT IS SO ORDERED:

24 
25 RICHARD E. BOULWARE, II
26 **United States District Court**
27 DATED this 24th day of November, 2021.
28

Certificate of Service

I hereby certify that on November 23, 2021, I electronically filed and served the foregoing second JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT'S OBJECTION TO MAGISTRATE JUDGE'S ORDER [ECF NO. 192] with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Daniel J. Treuden

Daniel J. Treuden
Attorney for Plaintiffs